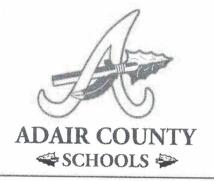
Dr. Pamela A. Stephens Superintendent

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Chairman Ajit Pai Federal Communications Commission 445 12th Street SW Washington, DC 20554

October 23, 2017

Dear Chairman Pai.

I am writing today in response to the Federal Communications Commission's (FCC) Public Notice which, among other things, considers changes to the E-Rate program. Before delving into my response to the proposed changes, I want to thank the FCC for your continued support for the E-Rate program and for the critical programmatic and policy changes the commission adopted in 2014. The E-Rate program provides critical discounts to assist schools (like mine) to obtain affordable telecommunications and internet access.

The Adair County School District is located in rural Columbia, Kentucky and has a high poverty rate among its students. There are 4 schools within our district. In 2016-2017, 2560 students were enrolled in grades K-12.

Our school district has participated in e-rate funding since 1998, the first year of E-Rate. In the early years, E-Rate funds allowed us to network our schools with Ethernet architecture and install a fiber optic network between buildings across campus. It has allowed us to purchase network switches and other components necessary to provide network connectivity and Internet access to all classrooms in our school district. In recent years and since the latest E-Rate modernization adopted in 2014, it allowed us to upgrade network components and to install a dense wireless network to all classrooms throughout the school district. In addition to this, since 1998, E-rate funds have substantially assisted our school district with the cost of telecommunications (local and long distance voice).

E-Rate funds have allowed us the opportunity to provide a state-of-the-art network (including wired and wi-fi) that could not otherwise have been afforded. This funding allows our students in the high poverty area of rural south-central Kentucky access to the same instructional opportunities as those student in cities of wealthier districts or anywhere in the world. We are able to provide our students with a world-class education. Anytime, anywhere access to technology within the school provides our students with a wealth of instructional opportunities as we strive for proficiency and beyond for all students. Response to Intervention (RTI), online college courses for advanced students, and enhanced daily instruction for all students are available because of E-Rate funding.

The E-Rate program is a program succeeding in its mission. As the FCC moves forward with this public notice, it is prudent to remain focused on the fact that E-Rate is a program that works. Any changes to the E-Rate program should be focused on expanding a successful program that has yet to reach its full potential and ensuring the FCC remains a good steward of the changes adopted in 2014, allowing those changes to progress and play out as intended.

E-Rate played a critical role in the rapid and significant expansion of connectivity in schools. And, the 2014 modernization was a much-needed update to ensure more schools and libraries are connected to broadband. The E-Rate's investment in Category 2 Wi-Fi and internal connections funding is extremely valuable and could not be replaced by school, district, or state funds.

Since 2014, Category 2 E-rate funds have afforded the Adair County School District the opportunity to upgrade its core network infrastructure and to install a dense state-of-the-art wi-fi network to all classrooms that was necessary to provide our students with the educational opportunities that they need and deserve. This has allowed us to integrate online research-based instruction and assessment programs for increased student success in the classroom. It allows us to provide Response to Intervention (RTI) and advanced learning opportunities for all students. Our high school students have the opportunity to take online credit recovery and online college courses.

Access to fast and dependable Internet is a must for teaching and learning in today's classroom. Technology is a proven tool that allows educators to meet the instructional needs of all students. It is imperative that all school districts are provided with an equal opportunity for providing this service regardless of geographical location or poverty level and E-Rate has provided just that.

In closing, I reiterate my district's continued, strong support for and reliance upon the E-Rate program for being able to access and afford the high-speed connectivity that is so central to our students' learning. Thank you for considering these comments.

Sincerely,

Carla Perkins, Director of Technology Adair County School District